

I am writing to comment on the change in the "established business relationship" rule in the TCPA. As a small association, this change will make our ability to contact members on a variety of issues including dues, educational opportunities, and association services much more difficult and costly.

Business firms join trade groups to take advantage of the services and products the trade group provides its members. There is no other reason to join a trade group.

As a consequence, members expect to be made aware and reminded of the services the association offers. They expect if not demand communications about the association's services and benefits.

There is no reason to impose barriers to these communications whether they be by regular mail, e-mail or fax.

The change in the regulation is inconsistent with the expectations and established relationships between a trade group and its members, undercuts that relationship and imposes costly and time consuming procedures (for both the association and its members) that have no real benefit.

Richard Bouhan
Executive Director
NAPSLO